

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION FOR DEPOSIT OF FUNDS

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Department (“Defendants” or “PRPB”), by and through the undersigned counsel, and respectfully state and pray as follows:

1. On June 26, 2014, the Court entered an Order for the Establishment of the TCA Office and the Payment of TCA Expenses (Dkt. 139) which provided that, from that point forward, all expenses incurred by the office of the Technical Compliance Advisor (“TCA” or “Monitor”) would be paid by the Court from funds deposited with the Clerk of the Court by the Commonwealth.

2. Per Order of May 1, 2020, the Commonwealth was ordered to deposit on or before July 1, 2020 with the Clerk of the Court, the following amounts: (1) \$1,500,000 for the TCA Office operating budget; and, (2) \$120,000 for the Special Master’s operating budget, for FY 2020-2021. Dkt. 1467.

3. Thereafter, per request from the PRPB, the Court certified the amount of funds remaining in deposit for the FY 2019-2020. The Court also amended its original Order to credit the amounts remaining in deposit for FY 2019-2020, and reduce the amounts to be deposited for FY 2020-2021. (Dkt. 1543).

4. The process for the issuance of the checks for both budgets was already running its course when the request was made and amended Order was issued, and changes thereto could not be timely made.

5. The PRPB will deposit with the Clerk of the Court check number 00320777 in the amount of \$1,500,000.00 for the TCA's budget and check number 00320778 in the amount of \$120,000.00 for the Special Master's budget, for FY 2020-2021. However, the PRPB respectfully requests that: 1. any additional budget needs during said fiscal year - for the TCA, Special Master or other experts that the Court deems appropriate to bring to the case - be covered by the surplus funds in deposit; and 2. the funds remaining at the end of FY 2020-2021 be credited to the following fiscal year.

WHEREFORE, Defendants respectfully requests the Court take notice of the above and grant Defendant's request that: 1. any additional budget needs during FY 2020-2021 - for the TCA, Special Master or other experts that the Court deems appropriate to bring to the case - be covered by the surplus funds in deposit; and 2. the funds remaining at the end of FY 2020-2021 be credited to the following fiscal year.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 30th day of June, 2020.

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